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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF META PLATFORMS,
INC.'S OPPOSITION TO PLAINTIFFS'
MOTION TO EXCLUDE PORTIONS OF
DR. JOHN LIST'S PROPOSED
TESTIMONY**

Hearing Date: TBD

Time: TBD

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration
4 in support of Meta's Opposition to Plaintiffs' Motion to Exclude Portions of Dr. John List's
5 Proposed Testimony.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Expert
7 Report of John A. List, dated January 12, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Merits
9 Expert Report of Joseph Farrell, dated January 12, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript
11 from the deposition of John A. List held on March 1, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the Expert
13 Report of Dennis Carlton, dated January 12, 2024.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of a letter from Molly
15 Jennings to Kevin Teruya regarding "User's Data Requests in *Klein v. Facebook*, Case No. 3:20-
16 cv-087970-JD," dated March 17, 2023.

17 7. Attached hereto as Exhibit 6 is a true and correct copy of an email exchange
18 between Sonal Mehta and Kevin Teruya regarding "Potential Solution re Data Requests before
19 CMC," dated April 26-27, 2023.

20 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the Expert
21 Reply Report of John A. List, dated February 9, 2024.

22 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the transcript
23 from the deposition of Dennis Carlton held on March 7, 2024.

24 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the transcript
25 from the deposition of Joseph Farrell held on September 22, 2023.

26 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the
27 transcript from the deposition of Joseph Farrell held on March 15, 2024.

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1 I declare that the foregoing is true and correct under penalty of perjury.

2 Executed on this 12th day of May, 2025, in Waterbury, Connecticut.

3 By: /s/ David Z. Gringer

4 David Z. Gringer

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SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta